

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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YI XIANG, Individually and on Behalf of All	:	Civil Action No. 1:16-cv-04923-VM-KNF
Others Similarly Situated,	:	<b>(Consolidated)</b>
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	NOTICE OF LEAD PLAINTIFF'S MOTION
	:	FOR FINAL APPROVAL OF SETTLEMENT
INOVALON HOLDINGS, INC., KEITH R.	:	AND APPROVAL OF PLAN OF
DUNLEAVY, THOMAS R. KLOSTER,	:	ALLOCATION AND FOR AN AWARD OF
DENISE K. FLETCHER, ANDRÉ S.	:	ATTORNEYS' FEES AND EXPENSES AND
HOFFMANN, LEE D. ROBERTS, WILLIAM	:	AN AWARD TO LEAD PLAINTIFF
J. TEUBER JR., GOLDMAN SACHS & CO.,	:	PURSUANT TO 15 U.S.C. §77z-1(a)(4)
MORGAN STANLEY & CO. LLC,	:	
CITIGROUP GLOBAL MARKETS INC.,	:	
MERRILL LYNCH, PIERCE, FENNER &	:	
SMITH, INCORPORATED and UBS	:	
SECURITIES LLC,	:	
	:	
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon: (i) the Declaration of Daniel J. Pfefferbaum, affirmed on June 7, 2019; (ii) the Declaration of Shawn A. Williams, affirmed on June 7, 2019; (iii) the Declaration of Darris Garoufalis, affirmed on June 6, 2019; (iv) the Stipulation of Settlement, dated February 19, 2019 and the Exhibits annexed thereto; (v) the Declaration of Mishka Ferguson, affirmed on June 6, 2019; (vi) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Approval of Plan of Allocation and for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §77z-1(a)(4); and (vii) all other proceedings herein, Lead Plaintiff Roofers Local No. 149 Pension Fund, through counsel, will move this Court, before the Honorable Victor Marrero, United States District Judge for the Southern

District of New York, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 11B, 500 Pearl Street, New York, New York on July 12, 2019, at 10:00 a.m., for entry of orders and judgments pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) finally approving the settlement of the captioned litigation; (2) approving the Plan of Allocation; (3) awarding Lead Counsel attorneys' fees, plus expenses in the litigation; and (4) awarding Lead Plaintiff compensation for its time and service representing the Class.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before July 5, 2019.

DATED: June 7, 2019

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SHAWN A. WILLIAMS  
DANIEL J. PFEFFERBAUM  
JOHN H. GEORGE

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s/Daniel J. Pfefferbaum  
DANIEL J. PFEFFERBAUM

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Additional Counsel for Lead Plaintiff

**CERTIFICATE OF SERVICE**

I, Daniel J. Pfefferbaum, hereby certify that on June 7, 2019, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice. I further certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 7, 2019, at San Francisco, California.

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s/ Daniel J. Pfefferbaum  
DANIEL J. PFEFFERBAUM